

EXHIBIT A

PR#152648

STREATER, EDDIE

8/26/2021

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OKLAHOMA
3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs. Case No. 14-CV-704-GKF-JFJ
6 OSAGE WIND, LLC; ENEL KANSAS,
7 LLC; AND ENEL GREEN POWER
NORTH AMERICA, INC.,

8 Defendants.

9 **VIDEOTAPE DEPOSITION OF EDDIE STREATER**

10 TAKEN ON BEHALF OF THE DEFENDANT

11 ON AUGUST 26TH, 2021

12 IN OKLAHOMA CITY, OKLAHOMA VIA ZOOM

13 APPEARANCES

14 On behalf of the PLAINTIFF:

15 Stuart Ashworth

Cathryn D. McClanahan

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19 and

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24 (Appearances continue on the following page.)

25 REPORTED BY: Jessica L. Weathington, CSR

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1 On behalf of the INTERVENOR-PLAINTIFF OSAGE MINERAL
2 COUNCIL:

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9 On behalf of the ENEL KANSAS AND ENEL GREEN POWER:

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15 and

16 Sarah M. Stevenson
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21 ALSO PRESENT: Jennifer Baker

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1 **Q** And so you haven't done anything to review
2 the files of the agency to determine whether or not
3 the representation by counsel is correct, right?

4 **A** I have not.

5 **Q** And you haven't talked to anyone else in
6 the agency to determine whether counsel is correct
7 about that, correct?

8 **A** That is correct.

9 **Q** And you haven't looked at any documents or
10 anything else other than what counsel handed you to
11 be able to determine whether that's correct, right?

12 **A** That is right.

13 **MR. BALL:** All right. Counsel, I am going
14 to object that the witness was not properly
15 prepared. I'm going to object that the
16 designation for which you prepared him is
17 narrower than what was agreed to in our
18 discussions last week. The -- the exclusion of
19 the provisions concerning the basis for
20 royalty -- the royalties and the determination
21 of the royalties, we understood from those
22 discussions was going to be a portion of what
23 Mister -- what your witness was going to be
24 designated on.

25 We continue -- we also note that we have

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1 asked for a designation on other topics besides
2 topic four and for a broader version of the
3 testimony on topic four than we understood you
4 were going to designate someone for. And we
5 reserve our rights on all those issues.

6 I don't have further questions for this
7 witness at this time, but we reserve our rights
8 on all the other topics and on the aspects of
9 topic number four as to which you -- you have
10 not prepared this witness which he hasn't been
11 presented for -- presented for including the
12 contemplated part, including the royalty part
13 and with that, I don't have further questions
14 for this witness at this time.

15 We view the deposition as still open
16 because of those other issues and because it
17 was not adequately prepared, but I don't have
18 further questions for this witness at this
19 time.

20 MR. ASHWORTH: I would note that the
21 witness was prepared for the topics that he
22 was -- was asked to give a topic on. As to the
23 two additional leases, this is a 30B6
24 deposition. We can prepare him during the
25 deposition. Two additional leases were given